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October 21, 2011

EX PARTE NOTICE

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Connect America Fund, WC Docket No. 10-90
A National Broadband Plan for Our Future, GN Docket No. 09-51
Establishing Just and Reasonable Rates for Local Exchange Carriers,
WC Docket No. 07-135
High-Cost Universal Service Support, WC Docket No. 05-337
Developing a Unified Intercarrier Compensation Regime,
CC Docket No. 01-92
Federal-State Joint Board on Universal Service, CC Docket No. 96-45
Lifeline and Link-Up, WC Docket No. 03-109**

Dear Ms. Dortch:

On October 20, 2011, Brad Ramsey of NARUC, Bill Haas of PAETEC, Christopher Murray of Earthlink, Tiki Gaugler and Lisa Youngers (by phone) of XO Communications, Kelsi Reeves of tw telecom (by phone), Thomas Jones of Willkie Farr & Gallagher LLP, and Kevin Joseph of The Joseph Group, LLC, Russell Blau of Bingham McCutchen, Joseph Gillan (by phone) of Gillan Associates, and Karen Reidy of COMPTTEL met with Sharon Gillett, Lisa Gelb, Albert Lewis, Marcus Maher, William Dever, Jennifer Prime, and Melissa Kinkel of the Wireline Competition Bureau.

In the meeting the parties stressed the importance of the Commission taking action, *at this time*, to confirm facilities-based VoIP providers' rights to direct IP-to-IP interconnection pursuant to section 251(c)(2) of the Communications Act, as amended. The parties discussed the importance of specific rights associated with section 251(c)(2), such as direct interconnection and interconnection that is "at least equal in quality," and the fact that the language of the statutory provision itself provides sufficient guidance to allow the negotiations for IP interconnection to begin.

Please do not hesitate to contact me if you have any questions regarding this submission.

Respectfully submitted,

/s/ Karen Reidy

Karen Reidy

cc (via email): Sharon Gillett
Lisa Gelb
Albert Lewis
Marcus Maher
William Dever
Jennifer Prime
Melissa Kinkel